

### **REMARKS**

The Examiner is thanked for the performance of a through search and for considering the references submitted by the Applicants in the Information Disclosure Statement filed on October 28, 2005.

Claims 1-2, 4-6, 10-11, and 13-15 have been amended. Claims 19 and 20 have been added. No claims have been canceled. Hence, Claims 1-20 are pending in the application.

#### **I. INTERVIEW SUMMARY**

A telephone interview in the present application was held on January 20, 2006. Examiner Syed Ali and Applicants' representatives Marcel K. Bingham and Stoycho D. Draganoff attended the interview. Claim 1 was discussed. The reference discussed was Rich et al., U.S. Patent No. 6,457,065 (hereinafter "RICH"). Agreement regarding the patentability of the discussed claims was not reached.

The Applicants' representatives proposed a set of amendments to Claim 1 and pointed out that the amended claim overcomes the teachings of RICH. The Examiner indicated that the amended Claim 1 would overcome RICH, but that an additional search was required in light of the amendments.

#### **II. OBJECTIONS TO THE SPECIFICATION**

The specification has been objected to because of an informality. The specification is amended herein to include the patent number of a related patent application that has issued as a patent. No new matter is introduced in the specification by this amendment.

#### **III. REJECTIONS BASED ON THE CITED ART**

##### **A. INDEPENDENT CLAIMS 1 AND 10**

Claims 1 and 10 have been rejected under 35 U.S.C. § 102(e) as allegedly anticipated by RICH.

Claims 1 and 10 have been amended as discussed in the Telephone Interview of January 20, 2006. Claims 1 and 10 comprise the features of:

receiving a command to perform one or more file system operations, **wherein said command expressly identifies said one or more file system operations;**  
in response to said command, **translating a plurality of operations including said one or more file system operations into database commands;**  
....

It is respectfully submitted that RICH does not teach or suggest the above features of Claims 1 and 10.

Specifically, the Office Action has asserted that the operations in RICH that write “version” (or modified) objects to persistent store are equivalent to the file system operations in Claim 1. This assertion is incorrect. The commands received by the system in RICH are user requests to change one or more objects, where groups of logical changes to objects are represented in transactions. (See RICH, col. 7, lines 55-59). All changes the user wants to make to an object within a scope of a transaction are made first to an internal copy (called “version”) of the object, without actually updating the persistent store where the object is stores. If the user finally decides to commit the changes to the object, then the “version” object is written to the persistent store. (RICH, col. 7, line 66 to col. 8, line 8.) Thus, in RICH’s system the received user requests to change or update an object do not specify what operation needs to be executed to cause an updated “version” of the object to be written to the persistent store.

In contrast, Claims 1 and 10 include the feature of receiving a command to perform one or more file system operations, where the command identifies at least one of the file system

operations that are to be performed. For the above reasons, this feature of Claim 1 is not taught or suggested by RICH.

In addition, Claims 1 and 10 comprise the features of translating a plurality of operations including said one or more file system operations into database commands, and a database server executing the database commands as part of nested transactions. It is respectfully submitted that RICH does not teach or suggest any such features. To the extent that the system in RICH is capable of writing an updated “version” object to a database, any database commands that may be used to write such “version” object to the database are generated and performed after the nested transactions, which included the changes to the object, have been completed. (See RICH, col. 19, lines 25-33.) For the above reason, the above features of Claims 1 and 10 are not taught or suggested by RICH.

For the reasons given above, it is respectfully submitted that RICH does not describe or suggest all features of Claims 1 and 10. Thus, RICH does not anticipate Claims 1 and 10 under 35 U.S.C. § 102(e), and reconsideration and withdrawal of the rejections are respectfully requested.

**B. DEPENDENT CLAIMS 2-9 AND 11-18**

Claims 2-9 and 11-18 have been rejected under 35 U.S.C. § 102(e) as allegedly anticipated by RICH.

Each of Claims 2-9 and 11-18 is dependent from one of independent Claims 1 and 10, and thus includes each and every feature of its corresponding independent claim. Each of Claims 2-9 and 11-18 is therefore allowable for at least the reasons given above for Claims 1 and 10. In addition, each of Claims 2-9 and 11-18 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already

identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, it is respectfully submitted that Claims 2-9 and 11-18 are allowable for the reasons given above with respect to Claims 1 and 10.

C. NEW CLAIMS 19-20

Each of Claims 19 and 20 is dependent from one of independent Claims 1 and 10, and thus includes each and every feature of its corresponding independent claim. Each of Claims 19 and 20 is therefore allowable for at least the reasons given above for Claims 1 and 10. In addition, each of Claims 19 and 20 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, it is respectfully submitted that Claims 19 and 20 are allowable for the reasons given above with respect to Claims 1 and 10.

IV. CONCLUSION

The Applicants believe that all issues raised in the Office Action have been addressed. Further, for the reasons set forth above, the Applicants respectfully submit that all pending claims are patentable over the cited art and for this reason allowance of the pending claims is appropriate. Entry of the Request for Continued Examination submitted herewith and reconsideration of the present application in light of the amendments and remarks herein are respectfully requested.

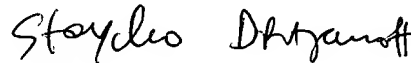
The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

To the extent necessary to make this reply timely filed, the Applicant petitions for an extension of time under 37 C.F.R. § 1.136. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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